

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

UNITED STATES OF AMERICA

v.

Case No. 1-24-mj-491

ROGER PIERRE LABERGE

*Defendant.*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Jessica Guzman Santiago, being duly sworn, depose and state as follows:

**BACKGROUND**

1. I am a Special Agent with the Naval Criminal Investigative Service (NCIS), and have been employed by NCIS since 2022. I am currently assigned to the NCIS Resident Agency Quantico, VA. As part of my current duties as an NCIS agent, I investigate criminal violations relating to crimes against people such as assaults, domestic violence and child abuse, amongst others. I have training and experience in the enforcement of the laws of the United States, including the preparation, presentation, and service of subpoenas, affidavits, criminal complaints, search warrants, and arrest warrants.

2. As a federal agent, I am authorized to investigate violation of laws of the United States and, as a law enforcement officer, I am authorized to execute warrants issued under the authority of the United States.

3. This affidavit is submitted in support of a criminal complaint charging ROGER PIERRE LABERGE, herein referred to as LABERGE, with assault of a USMC military police officer while in performance of official duties in violation of 18 U.S.C 111(a) and (b).

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers, witnesses, and/or agencies. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to law enforcement concerning this investigation. Rather, I have set forth only the facts necessary to establish probable cause for the requested complaint.

#### **SUMMARY OF PROBABLE CAUSE**

5. On May 15, 2024, NCIS was notified of a Provost Marshal's Office (PMO) Marine being struck by a vehicle at Gate 1 of Marine Corps Base Quantico (MCBQ), VA. At approximately 1:44 p.m. that day, military police officers, made contact with an older male wearing a red shirt, bald, who was driving a white in color, early model Ford F-150 pickup truck with a black camper top, and towing a compact, open trailer, who attempted to access MCBQ via Gate 1. MCBQ is within the special and territorial jurisdiction of the United States and within the Eastern District of Virginia. The older male, later identified as LABERGE related to the Military Police officers that he was unable to provide an identification or the registration for the vehicle he was driving or explain why he was at MCBQ. Officer-1 (O-1), who was a member of the United States military and in uniform and performing his duties to guard the gate at MCBQ that day, determined that LABERGE did not have authorized access onto the installation and requested he move his vehicle into the designated turnaround point. At approximately 1:46 p.m., LABERGE entered the designated turnaround point. When O-1 stepped in front of the vehicle to position himself on the passenger side, LABERGE accelerated his vehicle, slammed his brakes, and accelerated again, driving towards O-1, who was standing directly in front of the windshield, and subsequently striking O-1 and the plastic barricade without stopping. LABERGE kept accelerating

and struck the curb with his towed trailer, which resulted in his property falling out. LABERGE fled MCBQ after he made a U-turn, heading West onto Fuller Road, MCBQ. LABERGE struck O-1's left leg when he hit him with his car.

6. Various identification cards and documents were found within the property that fell out of LABERGE's truck. These documents and identification cards identified the driver as ROGER PIERRE LABERGE. Additionally, a vehicle registration check was conducted and the Florida license plate that was on the compact open trailer belonged to LABERGE. The Ford F-150 pickup truck had an Alabama license plate, whose owner could not be identified. Law enforcement officers located a social media account for LABERGE with photographs that appeared to match the photographs on the identification card(s). O-1 positively identified LABERGE from those photographs as the individual who struck him with the car.

### CONCLUSION

7. Based upon the above information, I respectfully submit there is probable cause to believe that LABERGE assaulted a USMC military police officer while in performance of official duties in violation of 18 U.S.C 111(a) and (b). I therefore respectfully request that the Court issue the attached complaint charging LABERGE with those offenses.

Respectfully submitted,

GUZMAN  
SANTIAGO.JESSICA.CRISTINA.160 9841679  
9841679

Digitally signed by GUZMAN  
SANTIAGO.JESSICA.CRISTINA.160 9841679  
Date: 2024.12.10 10:48:37 -05'00'

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Jessica Guzman Santiago, Special Agent  
Naval Criminal Investigative Service

Subscribed and sworn in accordance with Fed. R. Crim. P. 4.1  
By telephone on December 13, 2024:

**Lindsey R Vaala** Digitally signed by Lindsey R  
Vaala  
Date: 2024.12.13 15:08:56 -05'00'

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**The Honorable Lindsey R. Vaala**  
**United States Magistrate Judge**  
**Alexandria, Virginia**